

**UNITED STATES DISTRICT COURT FOR  
THE DISTRICT OF MARYLAND**  
(Northern Division)

UMAR BURLEY, *et al.*,

Plaintiffs,

v.

BALTIMORE POLICE DEPARTMENT,  
*et al.*,

Defendants.

Civil Action No. ELH-18-1743

**PLAINTIFFS UMAR BURLEY AND BRENT MATTHEWS' RESPONSE  
TO DEFENDANT, WAYNE JENKINS' MOTION TO DISMISS**

In his Motion to Dismiss [ECF No. 41], Defendant Wayne Jenkins seeks dismissal solely on the basis of statute of limitations as briefed by Defendants Baltimore Police Department and Dean Palmere.<sup>1</sup> By this Response, Plaintiffs incorporate and adopt the arguments on that issue made in their Consolidated Response in Opposition to Defendants Baltimore Police Department and Dean Palmere's Motion to Dismiss [ECF No. 29] and Defendants Guinn, Gladstone, Willard, Knoerlein, and Fries' Motion to Dismiss [ECF No. 33] ("Consolidated Response") filed on March 1, 2019. *See* ECF No. 35.

For all the reasons set forth in the Consolidated Response, the Court should deny Mr. Jenkins' Motion to Dismiss.

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<sup>1</sup> Defendants Guinn, Gladstone, Willard, Knoerlein and Fries also filed a motion to dismiss in which they incorporated and adopted Defendants Baltimore Police Department and Dean Palmere's Motion to Dismiss. *See* E.C.F. No. 33.

Dated: April 1, 2019

Respectfully submitted,

/s/

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*Attorneys for Plaintiffs Umar Hassan Burley and  
Brent Andre Matthews*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on April 1, 2019, a copy of the foregoing Plaintiffs Umar Burley and Brent Matthews' Response to Defendant, Wayne Jenkins', Motion to Dismiss was electronically filed via CM/ECF, with notice to all counsel.

/s/

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William N. Sinclair